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Pro se

Hearing Date: Dec. 5, 2022
Time: 10:00 a.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re

CIRILO MATA,

Case No. 22-22324-shl

Debtor. Chapter 7
-----X

**NOTICE OF HEARING ON ORTIZ & ORTIZ, L.L.P., APPLICATION PURSUANT TO
LOCAL RULE 2090-1(e), TO WITHDRAW AS DEBTOR'S COUNSEL**

PLEASE TAKE NOTICE, that upon the annexed Application dated November 2, 2022, (the "Application"), of Ortiz & Ortiz, L.L.P. ("O & O"), the undersigned will move before the Honorable Sean H. Lane, United States Bankruptcy Judge, in the United States Bankruptcy Court of the Southern District of New York, One Bowling Green, New York, New York 10004, on the 5th day of December, 2022 (the "Hearing Date"), at 10:00 a.m., or as soon thereafter as counsel may be heard, for the entry of an order pursuant to Local Rule 2090-1(e), allowing the withdrawal of O & O as counsel for the Debtor. Please note that Judge Lane's hearing are conducted by zoomgov. If you intend to appear at the hearing, you must pre-register at <https://www.nysb.uscourts.gov/ecourt-appearances>.

PLEASE TAKE FURTHER NOTICE, that any objection to the Application must (a) be in writing and (b) must be filed with the Clerk of the Bankruptcy Court electronically at www.nysb.uscourts.gov. If you do not have the ability to file an objection electronically, the objection may be filed with the Clerk of the Court by presenting the Clerk with a copy of the

objection saved in .pdf format by the date stated above. A copy of the objection must be provided to the Chambers of the Hon. Sean H. Lane, 300 Quarropas St, White Plains, NY 10601 10004, and the undersigned, so as to be received no later than seven (7) days before the hearing. The objection must comply with the Bankruptcy Rules and the Local Bankruptcy Rules of the court and must state with particularity the legal and factual bases for such objection.

Dated: November 2, 2022
New York, New York

/s/Norma Ortiz
Norma E. Ortiz
Ortiz & Ortiz, L.L.P.
287 Park Avenue South, Ste. 728
New York, NY 10010
Tel. (718) 522-1117
Attorney for the Debtor
Pro se

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re

CIRILO MATA,

Case No. 22-22324

Debtor.

Chapter 7

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**APPLICATION OF ORTIZ & ORTIZ, L.L.P., PURSUANT TO LOCAL
RULE 2090-1(e), TO WITHDRAW AS DEBTOR'S COUNSEL**

Ortiz & Ortiz, L.L.P. ("O & O"), counsel of record to Cirilo Mata (the "Debtor"), hereby states, in support of its application to withdraw as counsel, as follows:

1. O & O has served as Debtor's counsel since his voluntary Chapter 7 case was commenced on June 2, 2022.
2. O & O has determined that it can no longer represent the Debtor in the prosecution of his case.
3. O & O may not disclose the specific reasons for its requests. Such information is protected by the attorney-client privilege.

RELIEF REQUESTED

4. O & O hereby requests the entry on an order permitting it to withdraw as counsel pursuant to Local Rule 2090-1(e). O & O's request is based upon Rule 1.16(c) of the New York

Rules of Professional Conduct.

5. Rule 1.16(c) contains a number of grounds for the permissive withdrawal as an attorney of record. One or more of the grounds contained therein apply to the instant Application.

WHEREFORE, O & O requests that the Court grant the relief requested herein, and grant such other and further relief as deemed just.

Dated: November 2, 2022
New York, New York

/s/Norma Ortiz
Norma E. Ortiz
Ortiz & Ortiz, L.L.P.
287 Park Avenue South, Ste. 728
New York, NY 10010
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Pro Se

PROPOSED ORDER

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In re

CIRILO MATA,

Case No. 22-22324

Debtor.

Chapter 7

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**ORDER GRANTING APPLICATION OF ORTIZ & ORTIZ, L.L.P., PURSUANT
TO LOCAL RULES 2090-1(d), TO WITHDRAW AS DEBTOR'S COUNSEL**

Upon the Application of Ortiz & Ortiz, L.L.P., (“O & O”) pursuant to Local Rules 2090-1(e), to Withdraw as Counsel to Cirilo Mata, the above-captioned Debtor (the “Application”); notice of the Application having been provided to the Debtor, the Chapter 7 Trustee, and the U.S. Trustee; no written opposition to the Application having been filed and it appearing that sufficient notice having been given and that just cause exists to grant the relief requested in the Application; and for the reasons stated in the Application, it is hereby

ORDERED, that O & O is hereby relieved as counsel to Cirilo Mata in the instant case and authorized to withdraw as counsel of record pursuant to Local Rule 2090-1(e).

Dated: December __, 2022
New York, New York

HON. SEAN H. LANE
U.S. BANKRUPTCY JUDGE